

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RONNIE JONES, ET AL.,

Plaintiffs,

vs.

CITY OF BOSTON, ET AL.,

Defendants.

NO. 05-11832-GAO

JOINT STATEMENT WITH A REVISED, PROPOSED DISCOVERY SCHEDULE

The parties to the above-captioned action hereby submit the instant Joint Statement with a revised, proposed discovery schedule.

1. Stage I Fact Discovery. On October 5, 2006, the parties filed a Joint Statement With A Proposed Discovery Schedule whereby all Stage I fact discovery, inclusive of depositions of fact witnesses, but exclusive of requests to admit, would be propounded and/or noticed by January 12, 2007, and responded to or otherwise completed by March 30, 2007, unless otherwise ordered by the Court. Since the September 11, 2006 status conference, the parties have been actively engaged in discovery, including the production of documents and the depositions of four of defendants' current or former employees. Several additional depositions have been scheduled or are being scheduled. However, at this time, the parties anticipate the need for additional time to complete Stage I fact discovery and hereby agree to postpone all of the deadlines in the October 5, 2006 Joint Statement With A Proposed Discovery Schedule by approximately two months. Therefore, Stage I fact discovery shall be responded to or otherwise completed by **May 31, 2007**. Motions to compel regarding fact discovery shall be filed as soon as practicable, but not later than **June 15, 2007**.

2. Expert Discovery. All expert discovery shall be completed by **August 31, 2007**, unless otherwise ordered by the Court. Motions to compel regarding expert discovery shall be

filed as soon as practicable but not later than **September 28, 2007**.

3. Requests to Admit. Requests to admit shall be propounded by **September 21, 2007** and responded to by **October 12, 2007**.

4. Summary Judgment. All motions for summary judgment shall be filed by **October 19, 2007**. Each party shall have 30 days within which to file an opposition to any such motion, and the other party shall file any reply memorandum within 21 days thereafter. The Court will rule on any such motions prior to the parties proceeding with further discovery.

Respectfully submitted,

Plaintiffs, Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, Rachelle Couch, Keri Hogan, and the Massachusetts Association of Minority Law Enforcement Officers,

By their attorneys,

/s/ Nadine Cohen

Nadine Cohen, BBO # 090040
Lawyers' Committee for Civil Rights
Under Law of the Boston Bar Association
294 Washington Street, Suite 443
Boston, Massachusetts 02108
(617) 482-1145
(617) 951-8000

/s/ Robert Baker

Louis A. Rodriques, BBO # 424720
Rheba Rutkowski, BBO # 632799
Raquel J. Webster, BBO # 658796
Robert B. Baker, BBO # 654023
BINGHAM McCUTCHEN LLP
150 Federal Street
Boston, MA 02110

/s/ Maricia Woodham

Maricia Woodham, BBO # 600886
SABEL & SABEL, P.C.
Hillwood Office Center
2800 Zelda Road; Ste. 100-5
Montgomery, AL 36106
(334) 271-2770

**Defendants, City of Boston, Boston
Police Department, and Kathleen
O'Toole**

William F. Sinnott
Corporation Counsel

By their attorneys,

/s/ Mary Jo Harris

Mary Jo Harris, BBO # 561484
Speical Assistant Corporation Counsel
Morgan, Brown & Joy, LLP
200 State Street
Boston, MA 02109-2605
(617) 523-6666

Dated: January 18, 2007